

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

WILLIAM T. JOHNSON, JR.,	:	
	:	
Petitioner,	:	
	:	
v.	:	Civ. Act. No. 05-602-JJF
	:	
THOMAS CARROLL , Warden	:	
and M. JANE BRADY , Attorney	:	
General for the State of Delaware,	:	
	:	
Respondents.	:	

**MOTION FOR EXTENSION OF TIME TO FILE
CERTIFIED STATE COURT RECORDS**

1. The petitioner, William T. Johnson, Jr., has applied for federal habeas relief challenging his October 1996 Delaware Superior Court conviction by guilty plea for felony theft. D.I. 2. The undersigned filed an answer to the petition on November 18, 2005.

2. By the terms of the Court's order, the respondent is directed to attach to the answer certified copies of the state court records material to the questions raised in the petitioner's appeal.

3. Due to the large volume of record retrieval recently required by prosecutors in the appeals division, the undersigned has been unable to obtain the certified state court records in order to file them contemporaneously with the answer. The undersigned anticipates obtaining and copying the records on or before December 12, 2005.

4. Respondent submits that an extension of time to December 12, 2005 in which to file certified copies of the material portions of the state court records in this case is reasonable.

Respondent submits herewith a proposed order.

/s/ Elizabeth R. McFarlan
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Date: November 18, 2005